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| 1 | BEFORE THE ARIZONA CORPORATION COM. | |
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| 5 | SUSAN BITTER SMITH | THIS DEC TO 1 2 13 |
| 6 | Chairman | MOISSIMMOS GOOD TA |
| 7 | BOB STUMP | AZ CORP COMMISSION DOCKET CONTROL |
| 8 | Commissioner | DOGNETOUTHOL |
| 9 | BOB BURNS | |
| 10 | Commissioner | Arizona Corporation Commission |
| 11 | DOUG LITTLE | DOCKETED |
| 12 | Commissioner | |
| 13 | TOM FORESE | DEC 16 2015 |
| 14 | Commissioner | |
| 15 | | DOCKETED BY |
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| 17 | COMMISSION PROFIBER INTO |) DOCKET NO. ALL 00000 A 15 0246 |
| 18 | COMMISSION INQUIRY INTO |) DOCKET NO. AU-00000A-15-0246 |
| 19 | POSSIBLE MODIFICATION OF THE | <u> </u> |
| 20 | COMMISSION'S HOLDING |) COMMENTS OF INTECRA |
| 21 | COMPANIES AND AFFILIATED |) COMMENTS OF INTEGRA |
| 22 | INTEREST RULES, A.A.C. ARTICLE 8, |) |
| 23 | R14-2-801 | <i>)</i> |
| 24 | |) |
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By its filing made November 16, 2015, the Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") invited affected telecommunications utilities and interested parties to provide informal written comments regarding changes to A.A.C. R14-2-801, et seq., the Affiliated Interest Rules (the "Rules"). In response, Eschelon Telecom of Arizona, Inc., Electric Lightwave, LLC, and Mountain Telecommunications of Arizona, Inc., all dba Integra Telecom ("Integra") submit the following comments.

Integra supports the proposal to amend the Rules by exempting telecommunications utilities whose retail services are classified as competitive by the Commission. Integra believes the requirements of the Rules are unnecessary for competitive carriers. Indeed, Eschelon Telecom of Arizona, Inc. was granted a limited waiver on April 17, 2002 in Decision No. 64737. Electric Lightwave, LLC and Mountain Telecom of Arizona, Inc. were granted a limited waiver on July 30, 2013 in Decision No. 73999. Although the Integra operating entities have limited waivers of the Rules, Integra believes that a uniform, total exemption of these rules for all

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| adopted by the Commission. Respectfully submitted, Douglas K. Denney Vice President, Costs & Policy Integra Telecom 18110 SE 34th Street Building One, Suite 100 Vancouver, WA 988683 Direct: 360-558-4318 ORIGINAL and thirteen (13) copies filed this 15th day of December, 2015, with: Docket Control ARIZONA CORPORATION COMMISSION 1200 West Washington Street Phoenix, Arizona 85007 Copies of the foregoing were sent by UPS Overnight Delivery this 15th day of December, 2015, to: Sarah Harpring Arizona Corporation Commission 1200 W. Washington Phoenix, Arizona 85007 Lyn Farmer Hearing Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007 Lyn Farmer Hearing Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007 Janice Alward, Chief Counsel Legal Division Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007 | 1 | carriers classified as competitive providers is both appropriate and equitable and should be | |
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| Dated: December 15, 2015. Dated: December 15, 2015. Douglas K. Denney Vice President, Costs & Policy Integra Telecom 18110 SE 34th Street Building One, Suite 100 Vancouver, WA 988683 Direct: 360-558-4318 ORIGINAL and thirteen (13) copies filed this 15th day of December, 2015, with: Docket Control ARIZONA CORPORATION COMMISSION 1200 West Washington Street Phoenix, Arizona 85007 Copies of the foregoing were sent by UPS Overnight Delivery this 15th day of December, 2015, to: Sarah Harpring Arizona Corporation Commission 1200 W. Washington Phoenix, Arizona 85007 Douglas K. Denney Vice President, Costs & Policy Integrated President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Building One, Suite 100 Vancouver, WA 988683 Direct: 360-558-4318 ORIGINAL and thirteen (13) copies filed this 15th day of December, 2015, with: Docket Control ARIZONA CORPORATION COMMISSION 1200 West Washington Street Phoenix, Arizona 85007 Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Denney Vice President, Costs & Policy Integrated Douglas K. Deney Integrated Douglas K. Deney Vice President, Costs & Policy Integra Telecom Integra Tele | 2 | adopted by the Commission. | |
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